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Attorneys for Plaintiff  
DIALYSIS NEWCO, INC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JANET NECHALDAS, an individual,  
  
Plaintiff,

vs.

DIALYSIS NEWCO, INC., A  
DELAWARE CORPORATION; AND  
DOES 1-100, INCLUSIVE,  
  
Defendants.

Case No. 4:15-cv-03322-EMC

**STIPULATION AND [proposed] ORDER  
OF DISMISSAL WITH PREJUDICE**

**Complaint Filed:** June 2, 2015  
**Trial Date:** February 13, 2017

1 Pursuant to Federal Rules Civil Procedure 41(a)(1)(A)(ii) and local Rule 7-12, Plaintiff  
2 Janet Nechaldas and Defendant Dialysis Newco Inc., jointly stipulate that the Complaint and all  
3 claims against Defendant be dismissed with prejudice, with each party to bear its own attorneys'  
4 fees and costs.

5  
6 Dated: August 5, 2016

SARNOFF + SARNOFF  
A Professional Corporation

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8  
9 By: Maria a. Bourn

David Sarnoff  
Maria Bourn  
Attorneys for Plaintiff  
JANET NECHALDAS

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11  
12 Dated: August 5, 2016

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

13  
14 By: [Signature]

Gregory C. Cheng  
Rachel J. Moroski  
Attorneys for Defendant  
DIALYSIS NEWCO, INC

[proposed] order

PURSUANT TO STIPULATION, IT IS SO ORDERED, that Plaintiff's Complaint and all of her claim against Defendant DIALYSIS NEWCO INC., are dismissed with prejudice, with each party to bear its own attorneys' fees and costs.

DONE AND ORDERED in Chambers on San Francisco, California this 8th day of August, 2016.



**CERTIFICATE OF SERVICE**

COUNTY OF SAN FRANCISCO )  
 ) ss.  
STATE OF CALIFORNIA )

I am employed in the County of San Francisco in the State of California. I am over the age of 18 and not a party to the within action; my business address is 20 Park Road, Suite D, Burlingame, CA 94010

On the date set forth below, I served the following document(s):

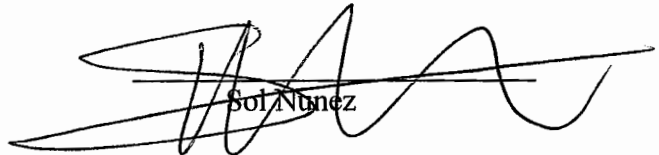
**Stipulation and [proposed] ORDER OF DISMISSAL WITH PREJUDICE**

in this action by placing a true copy thereof in a sealed envelope addressed as follows:

Gregory Cheng  
Rachel J. Moroski  
OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.  
Steuart Tower, Suite 1300  
One Market Plaza  
San Francisco, CA 94105

[X] By Mail: I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the US Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 5, 2016, at Burlingame, California.

  
Sol Nunez